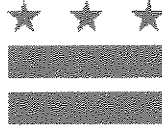


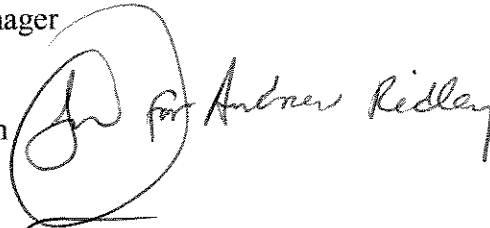
**GOVERNMENT OF THE DISTRICT OF COLUMBIA**  
**OFFICE OF THE ATTORNEY GENERAL**

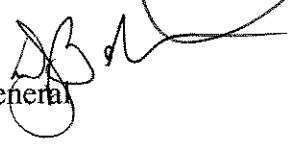


ECONOMIC DEVELOPMENT UNIT

**MEMORANDUM**

TO: Venita Ray, LSW Program manager

THROUGH: Andrew Ridley, Acting Chief  
Economic Development Section  
Commercial Division 

FROM: Denise J. Baker  
Assistant Attorney General 

DATE: May 18, 2005

SUBJECT: **Request for Lead Safe Washington Policy Relating to Risk Assessments and Inspection**

You requested that this office draft a policy relating to the LSW risk assessments and inspections. This office prepared an Administrative Instruction (AI) pertaining to your request, which is attached hereto. This AI is approved as to legal form and sufficiency.

Attachment



## ADMINISTRATIVE INSTRUCTION

Series: 3400  
No.: 006

**SUBJECT: Lead Safe Washington Policy and Procedure  
for Risk Assessment and Inspection**

REVISED: \_\_\_\_\_

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### I. PURPOSE

This Administrative Instruction (AI) describes the policies and procedures for the Lead Safe Washington Program (LSW) Risk Assessments and Inspections

A. The purposes of risk assessments and inspections are:

1. To identify conditions that may result in adverse human health effects from the following sources: deteriorated lead-based paint (LBP), interior dust-lead hazards, soil lead hazards, chewable surfaces, friction surfaces and impact surfaces, as defined by HUD and EPA
2. To test paint on surfaces that will be disturbed during renovation

### II. AUTHORITY

A. This AI incorporates the Lead-Based Paint Hazard Control Grant Program established by Title X of the Housing and Community Development Act of 1992 (Public Law 102-550), known as the Residential Lead-Based Paint Hazard Reduction Act. The primary purpose of the Program is to reduce the exposure of young children to lead-based paint hazards in their homes.

B. This AI incorporates the Lead Safe Housing Rule, 24 CFR Part 35, as it relates to risk assessments and inspections

C. This AI incorporates the District of Columbia Lead-Based Paint Abatement and Control Act of 1996, as amended, as it relates to risk assessments and certifications

### III. DEFINITIONS

A. "Inspection" is a surface-by-surface investigation to determine the presence of lead-based paint.



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B. "Risk Assessment" means an onsite investigation to determine and report the existence, nature, severity, and location of lead-based paint hazards in a residential dwelling, including:

3. Gathering information regarding the age and history of the housing and occupancy by children under 8 years of age;
4. Visual inspection;
5. Dust wipe sampling or other environmental sampling techniques;
6. Other activity as may be appropriate; and
7. Provision of a report explaining the results of the investigation and options for reducing lead-based paint hazards

C. "Verified Lead Level" or "Action Level" means a risk assessor verified level of lead-based paint (LBP) or lead hazard of greater than or equal to .07mg/cm<sup>2</sup> or any LBP hazards, including paint, floor dust, window sills or soil in dwelling with Elevated Blood Lead (EBL) child

D. "XRF Performance Characteristic Sheet" defines acceptable operating specifications and procedures for each model of x-ray fluorescence (XRF) lead paint analyzer.

E. Distinguish "risk assessment" from "inspection"—a risk assessment determines the presence of lead-based paint hazard, while an inspection determines the presence of lead-based paint.

## IV. POLICY

A. Statement. LSW and property owners funded by LSW shall obtain pre-rehabilitation inspection and risk assessment information from authorized assessors to aid in the management and control of lead-based paint and lead hazards efficiently and effectively during rehabilitation activities, with particular attention to the requirements of the Lead Safe Housing Rule, 24 CFR Part 35 and District of Columbia law.

B. Personnel. All work must be performed by business entities certified to perform risk assessments and by individuals certified and/or licensed to perform risk assessments by the District or EPA.

1. Individuals. An individual is authorized to perform risk assessments for the LSW Program if that individual:

- a. Is certified by the Mayor of the District or his/her designee; or

**ADMINISTRATIVE INSTRUCTION****Series:** 3400  
**No.:** 006**SUBJECT: Lead Safe Washington Policy and Procedure  
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- b. Possesses a certification provided by a training program that has been formally accredited either by EPA or by an EPA-approved District program
2. Business Entity. A business entity is authorized to perform risk assessments for the LSW Program if that business entity is certified by the Mayor or his/her designee
3. Personnel Restrictions. LSW or the Department of Housing and Community Development (DHCD) reserves the right to restrict the assignment of any individual, for any reasonable cause, as a risk assessor under a contract or any subcontractor.
- C. Risk assessments and related work must be performed in accordance with applicable work practice standards of the District of Columbia or EPA. When more than one regulatory provision applies to a condition or activity, the most stringent shall be used. Applicable regulations are those that are in force when and where the lead evaluation is conducted, including, but not limited to:
- U.S. Department of Housing and Urban Development (HUD) 24 CFR Part 35
  - U.S. Occupational Safety and Health Administration: 29 CFR 1926
  - U.S. Environmental Protection Agency (EPA): 40 CFR 745
  - District of Columbia Law and Regulations
- D. Risk Assessment Process. The risk assessment shall include the following activities: occupant interviews, testing for lead content of all coatings on surfaces to be disturbed during the renovations, lead hazard identification of deteriorated paint, friction, impact and chewable surfaces, and dust and soil sampling. Invoices will not be paid until the complete report is received and accepted by LSW.

**V. PROCEDURES**

- A. Risk Assessment Procedures--General
- Determine owner needs for inspection services
  - Protocol includes questionnaire to identify occupant activities and risks
  - Procedures for obtaining building and paint history
  - Procedures for summarizing and interpreting test data
  - Determination and recommendations for remediation of both immediate and potential lead hazards
1. Identification of Lead-Based Paint. The risk assessor shall sample all components/surfaces to be disturbed during the renovation, as well as any surface that is deteriorated or hazardous. If a component is not to be disturbed and is not a hazard, it should not be sampled for lead content. Identification of

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LBP may be done by XRF testing or by collecting samples of paint followed by laboratory analysis.

2. XRF sampling. Include protocols that indicate rationale, calibration checks and procedures, sampling strategy and technique in addition to specific analyzer PCS sheets and forms
3. Paint Chip Sampling Procedures. Paint chip samples are collected when the overall results for a component type are inconclusive. Paint chip samples should contain all layers of paint (not just peeled layers) and must always include the bottom layer. Paint from 4 square inches (25 sq. cm.) should provide a sufficient quantity for laboratory analysis. Smaller surface areas may be used, if the laboratory indicates that a smaller sample is acceptable. In all cases, the surface area sampled must be recorded.
4. Soil Sampling Procedures. Include protocols that indicate rationale, sampling strategies and techniques and chain of custody procedures
5. Dust Sampling Procedures. Include protocols that indicate rationales, sampling strategies and techniques and chain of custody procedures. Describe the purpose of the dust wipe sampling for risk assessment, how to decide where to collect lead dust wipe samples, the procedures for collecting, recording and managing the samples for laboratory analysis. Specify use of a qualified (ELAP or NLLAP) laboratory. Summarize chain of custody procedures and provide copies of chain of custody forms. Include a list of tools and materials that will be used during inspection.
6. Interviewing Occupants and Owner. The risk assessor shall acquire whatever signed permission releases are needed to enter the dwelling and conduct the lead risk assessment. The risk assessor shall use the resident questionnaire from the HUD Guidelines and shall, at a minimum, collect the following information:
  - Age of the building
  - Identify the numbers of occupants and their ages, with specific note being made of children under age 8, women of childbearing age and other persons to be considered at risk from the hazards of lead
  - The risk assessor should interview the owner, if possible, to identify occupant use patterns and past and proposed maintenance and renovation activities.
7. Component Sampling within Each Room or Area
  - a. Windows. When testing windows, at a minimum, the following window surfaces shall be tested: Exterior sash, jamb, casing and trough; Interior sash, casing and sill.

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- b. Doors. When testing doors, at a minimum, the following surfaces shall be tested: jamb, both sides of the door itself and door casing.
  - c. Component Sampling Locations. All testing shall include the following identification items: the room or area, component or portion of component tested, exact location of each component tested and the substrate.
  - d. Wallpaper: It shall be assumed to cover paint and shall be tested.
  - e. The risk assessor shall regard parts of the building components as separate testing combinations if visual indication or evidence exists that the different parts have separate and/or distinct painting histories.
8. Identification of Dust Lead Hazards, Friction, Impact and Chewable Surfaces and Dust Wipe Sampling. The risk assessment shall include identification of all lead hazards as defined by HUD and EPA. Dust samples shall be collected from floors and sills in all sampled living areas. The exact locations of each dust sample collected and each hazard identified shall be clearly identified. The presence of a dust-lead hazard in a dwelling unit or common area must be determined by comparing the hazard standard to the weighted arithmetic mean of all single-surface and composite dust sub-samples taken from the same component type in a dwelling unit or common area. Quality control samples must be taken and submitted for analysis with samples from each structure.
9. Identification of Soil Lead Hazards and Sampling of Areas of Bare Soil. Soil samples shall be taken any time the risk assessor identifies bare soil. Risk assessor must collect a minimum of two samples from play and non-play areas, with the option of an additional composite sample from the drip line/perimeter of the building. The risk assessor shall separately identify children's play areas and non-play areas, if applicable.
10. Hazard Control Options. All hazard control options provided by the risk assessor must be technically feasible and specifically suited to the identified surface(s) or hazard. The control options must take into account the surfaces to be disturbed during the renovation, the condition of the property and the location and severity of hazards. Rough cost estimates shall be provided for all hazard control options. Risk assessors are advised that hazard control options provided by the risk assessor(s) will be evaluated in the context of Lead Safe Housing Rule, 24 CFR Part 35, requirements.
- a. For projects where the amount of federal rehabilitation assistance is \$5,000-\$25,000, LSW and its owner-grantees are required only to perform interim controls



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- b. For projects where the amount of federal rehabilitation assistance exceeds \$25,000, LSW and its owner-grantees are required to abate all identified lead hazards (not all LBP)
- c. Each hazard control option must be clearly identified as either being interim control or abatement. Full abatement will require HUD prior approval.

### B. Reporting Procedures

1. Minimum Risk Assessment Report Requirements. The risk assessment report shall contain at least the following:

- Notice of Evaluation Results.
- Completed copy of Notice of Evaluation Results suitable for distribution by the LSW to the occupants.

2. Summary of Risk Assessment. An executive summary written in simple and easy-to-understand English describing the on-site investigation conducted and the results. The summary must be in the basic format found at 24 CFR Part 35, Appendix B and include the names of all risk assessors performing services, the date the site was visited and samples collected. The summary must include all identified lead-based paint and/or lead-based paint hazards and their locations. In addition, it must include all treatment options for each hazard identified, clearly identified as either being interim control or abatement.

3. If paint testing is performed, the summary will include the information found at 24 CFR Part 25, Appendix A. It will also contain a list of all surfaces tested, with the unique test identification number (ID) for each test combination and the results, the location description of the testing combination where any XRF measurement or paint sample was collected, the XRF and/or laboratory analysis measurement value with units of measure, i.e., for paint, mg/sq. cm., and the lead classification result for the surface as positive or negative.

4. Date Collected. The risk assessor shall provide all interview questionnaires, sampling forms and field notes, all XRF results, raw data, analytical laboratory results, and all miscellaneous photographs or documents relating to the on-site visit, assessments and all paint, dust and soil samples collected.

- List of all surfaces tested and/or sampled.
- Identification of all lead-based paint and/or LBP hazards with sufficient detail to permit replication of sampling and/or testing effort(s).
- Sketches or drawings of property with floor plan detailing all sample locations



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5. Exemptions, List all exemptions the household or building is entitled to, for example, the historic exemption, or interior rooms where lead is not to be disturbed above the de minimus, the safe work practice exemption as well as the clearance exemption.

6. Clarifications and Revisions: If the report is not clearly written and understood by LSW or DHCD, then LSW or DHCD reserves the right to request clarification and revision by the risk assessor, at no additional cost.

### VI. ATTACHMENTS

Single-Family Housing LBP Testing Data Sheet

Single Family Housing: Component Type Report

Calibration Check Test Results Sheet

Substrate Correction Values Sheet

Selection of Housing Units Sheet

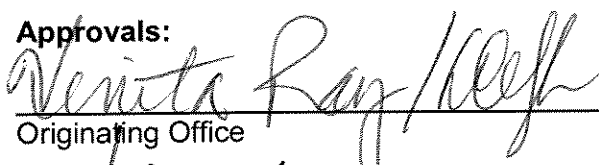
Multifamily Housing LBP Testing Data Sheet

Multifamily Housing: Component Type Report

Multifamily Decision Flowchart

Inspection Risk Assessment Report Format

#### Approvals:

  
\_\_\_\_\_  
Originating Office

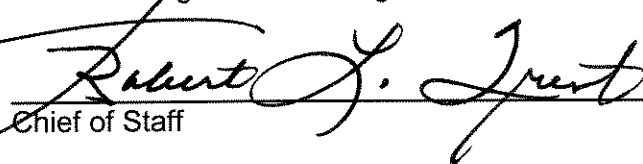
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Office of Program Monitoring

5/20/05  
\_\_\_\_\_  
Date

  
\_\_\_\_\_  
Chief of Staff

5/24/05  
\_\_\_\_\_  
Date





Government of the  
District of Columbia

Department of Housing and  
Community Development

Administrative Issuance  
Date: May 18, 2005

## ADMINISTRATIVE INSTRUCTION

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No.: 006

**SUBJECT:** Lead Safe Washington Policy and Procedure  
for Risk Assessment and Inspection

REVISED: \_\_\_\_\_

Chief Operating Officer

5/23/05

Date

Director

MAY 25 2005

Date



Government of the  
District of Columbia

Department of Housing and  
Community Development

Administrative Issuance  
Date: May 18, 2005

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Attachment 1



## Page \_\_\_\_\_ of \_\_\_\_\_

Address/Unit No. \_\_\_\_\_

Date \_\_\_\_\_ XRF Serial No. \_\_\_\_\_

Inspector Name \_\_\_\_\_ Signature \_\_\_\_\_

[illegible]

# Calibration Check Test Results

Page \_\_\_\_\_ of \_\_\_\_\_

Address/Unit No. \_\_\_\_\_

Device \_\_\_\_\_

Date \_\_\_\_\_ XRF Serial No. \_\_\_\_\_

Contractor \_\_\_\_\_

Inspector Name \_\_\_\_\_ Signature \_\_\_\_\_

NIST SRM Used \_\_\_\_\_ mg/cm<sup>2</sup> Calibration Check Tolerance Used \_\_\_\_\_ mg/cm<sup>2</sup>

## First Calibration Check

NIST SRM			First Average	Difference Between First Average and NIST SRM*
First Reading	Second Reading	Third Reading		

## Second Calibration Check

NIST SRM			Second Average	Difference Between Second Average and NIST SRM*
First Reading	Second Reading	Third Reading		

## Third Calibration Check (if required)

NIST SRM			Third Average	Difference Between Third Average and NIST SRM*
First Reading	Second Reading	Third Reading		

## Fourth Calibration Check (if required)

NIST SRM			Fourth Average	Difference Between Fourth Average and NIST SRM*
First Reading	Second Reading	Third Reading		

\* If the difference of the Calibration Check Average from the NIST SRM film value is greater than the specified Calibration Check Tolerance for this device, consult the manufacturer's recommendations to bring the instrument back into control. Retest all testing combinations tested since the last successful Calibration Check test.

# Substrate Correction Values

Page \_\_\_\_ of \_\_\_\_

Address/Unit No. \_\_\_\_\_

Date \_\_\_\_\_ XRF Serial No. \_\_\_\_\_

Inspector Name \_\_\_\_\_ Signature \_\_\_\_\_

Use this form when the *XRF Performance Characteristics Sheet* indicates that correction for substrate bias is needed.

Substrate			Brick	Concrete	Drywall	Metal	Plaster	Wood
L O C A T I O N	1	First Reading						
		Second Reading						
		Third Reading						
	2	First Reading						
		Second Reading						
		Third Reading						
Correction Value (Average of the Six Readings)								

Transfer Correction Value for each substrate to the 'Correction Value' column of the LBP Testing Data Sheet.

Notes:

## Page \_\_\_\_\_ of \_\_\_\_\_

Date \_\_\_\_\_

**Signature**

Number of Distinct Units  
to be Sampled[illegible]

# Record to one decimal place (e.g., 25.4)

# Multifamily Housing LBP Testing Data Sheet

Page \_\_\_\_ of \_\_\_\_

Address/Unit No. \_\_\_\_\_

Date \_\_\_\_\_

Room Equivalent \_\_\_\_\_

XRF Serial No. \_\_\_\_\_

Inspector Name \_\_\_\_\_

Signature \_\_\_\_\_

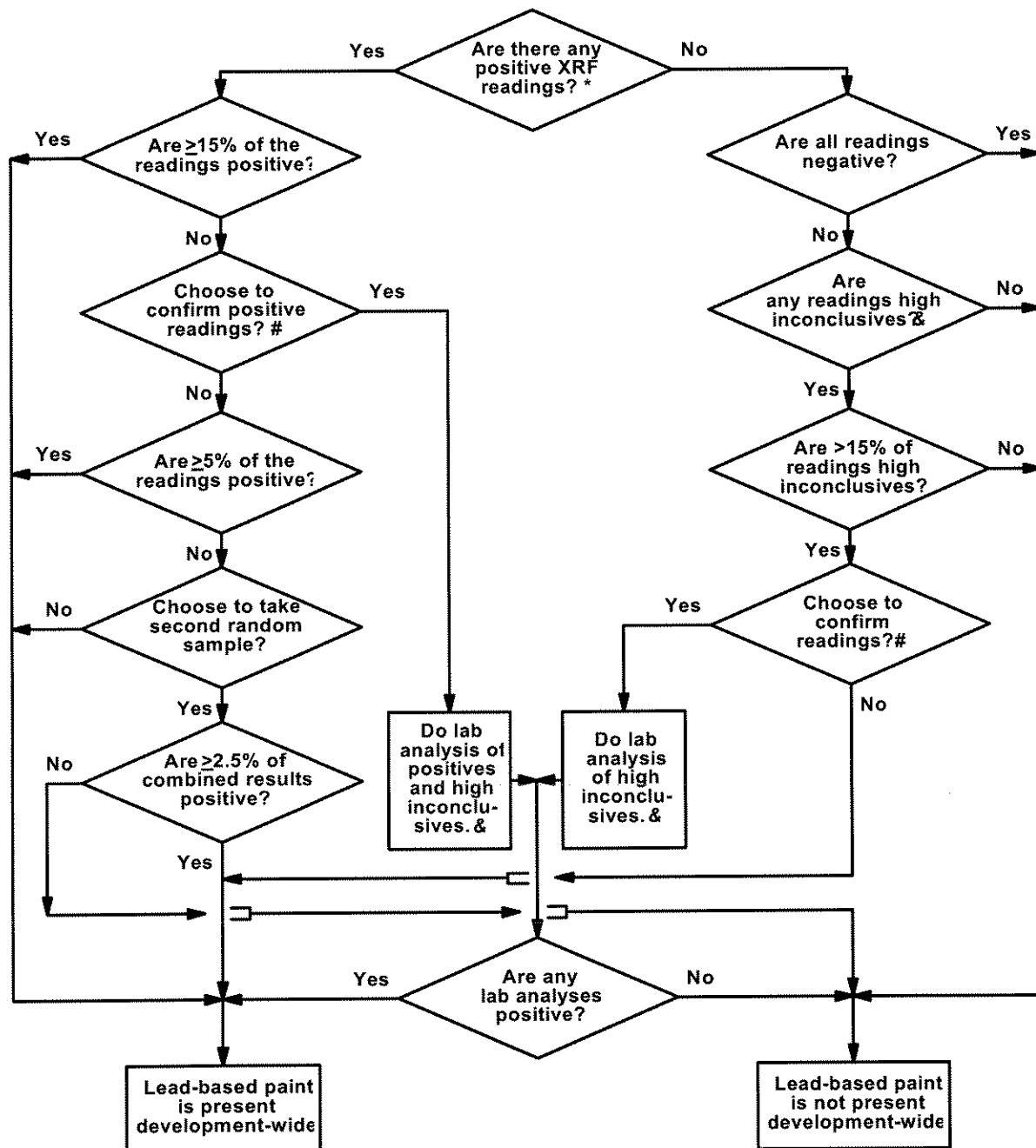
Sample ID#	Substrate	Component	Color	Replication Number	Test Location	XRF Reading	Correction Value	Corrected Reading	Classification (pos, neg, inc)	Laboratory Result	UNITS	Laboratory Classification
											mg/cm <sup>2</sup>   %	
											mg/cm <sup>2</sup>   %	
											mg/cm <sup>2</sup>   %	
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											mg/cm <sup></sup>	



## Page \_\_\_\_\_ of \_\_\_\_\_

Date \_\_\_\_\_ XRF Serial No. \_\_\_\_\_

[illegible]



\* "Positive," "negative," and "inconclusive" XRF readings are determined in accordance with the XRF instrument's Performance Characteristics Sheet as described in the HUD Guidelines for the Evaluation and Control of Lead Hazards in Housing, chapter 7.

& A high inconclusive reading is an XRF reading at or above the midpoint of the inconclusive range. For example, if the inconclusive range is 0.41 to 1.39, its midpoint (average) is 0.90; a reading in the range from 0.90 to 1.39 would be a high inconclusive reading.

# Any paint or coating may be assumed to be lead-based paint, even without XRF or laboratory analysis. Similarly, any XRF reading may be confirmed by laboratory analysis.

Figure 7.1 Multifamily Decision Flowchart

# INSPECTION RISK ASSESSMENT REPORT FORMAT

## **PART I: EXECUTIVE SUMMARY (See Attachment A)**

1. Identifying Information
2. Definitions/Terms Used in Report (Any testing variations, etc. or additional miscellaneous information)
3. Summary of Results, Prioritization and Recommendation

## **PART I. A: NOTICES of LEAD Hazard Evaluation**

1. For each sampled unit, provide a recommended Notice of Lead Hazard Evaluation to include the location and type of identified Lead Hazards and an indication of hazard priorities
2. For all other units (non-sampled), provide one recommended Notice to include the location and type of Identified Lead Hazards in all common areas (with a summary of what was assessed in the sampled units) and an indication of hazard priorities.

## **PART II: COMPLETED MANAGEMENT, MAINTENANCE AND ENVIRONMENTAL RESULTS FORMS AND ANALYSES<sup>1</sup>**

1. Resident Questionnaire (HUD Form 5.0 and Occupancy Survey with Lead Hazard Levels (if applicable)).
2. Management Information (Use HUD Form 5.6).
3. Maintenance Paint Condition Information (HUD Form 5.7).
4. Building Condition (HUD Form 5.1).
5. Copy of Borrower's Request for Lead Hazard Evaluation and list of Components to be distributed by the Planned Rehab and Estimated Rehab Hard Cost/Unit Prior to Evaluation.
6. Brief Narrative Description of Dwelling Selection Process.
7. Analysis of previous XRF Testing Report (if used as part of current evaluation).
8. Computer generated XRF report printout.
9. Paint Inspection with Deteriorated Paint Sampling Results (HUD Form 5.3).
10. Dust Sampling Results (HUD Form 5.0a).
11. Soil Sampling Results (HUD Form 5.5).
12. Other Sampling Results (if applicable).

## **PART III: LEAD HAZARD CONTROL PLAN**

1. Borrower's Proposed Lead Based Paint Policy Statement (if any).
2. Name and Contact Information of Individual in Charge of Lead Hazard Control Program for Planned Rehabilitation.
3. Acceptable Temporary Measure Options and Estimated Costs (identify what is not already part of the rehab scope of work).
4. Acceptable Permanent Control Options and Estimated Costs (identify what is not already part of the rehab scope of work).

<sup>1</sup> Copies of all HUD forms are contained in chapters 5 and 7 of HUD's Technical Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing and can be accessed on HUD's website at <http://www.hud.gov/offices/lead/guidelines/hudguidelines/index.cfm>.

## INSPECTION RISK ASSESSMENT REPORT FORMAT (CONT'D.)

5. Recommended Temporary Measures and Permanent Controls to be implemented in this property (modifications to previous Rehab scope of work).
6. Training Plan for Managers, Maintenance Supervisors and Workers (if applicable)
7. Signature of Risk Assessor and date.
8. Copy of Risk Assessor's and Company's Certification and License.

### **PART IV: APPENDIX**

1. All laboratory raw data.

**Lead Free Determinations:** Please note that the District of Columbia Department of Health does not consider a pre-1978 building "lead free" unless all pre-1978 components have been replaced. Thus, the DC Department of Housing and Community Development will not accept Lead Free Certificates for pre-1978 buildings unless all pre-1978 components have been replaced.

Contact Lawrence C. Cager, Jr. at (202) 442-7280 if you have any questions.